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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CLAIRE LEE, an individual;

Plaintiff,

vs.

WANG GLOBALNET d/b/a HANMI; DOES
I through X; and ROE Corporations XI
through XX, inclusive,

Defendant.

CASE NO.: 2:18-cv-01274-JCM-CWH

**JOINT STIPULATION AND ORDER
TO STAY DISCOVERY**

(Third Request)

JOINT STIPULATION AND ORDER TO STAY DISCOVERY

The parties, by and through their respective counsel of record, submit the following Joint Status Report in accordance with the Court's May 17, 2019, Order (ECF No. 23).

1. On April 3, 2019, the Court granted the parties' request to extend the then-existing stay in the proceedings for an additional 30 days, up to and including May 1, 2019. (ECF No. 20).

2. The additional 30 days were necessary for Plaintiff's counsel to obtain contact with the Plaintiff, who is in the military and was unable to be contacted while at basic and advanced training.

3. The parties agreed that an Early Neutral Evaluation would be beneficial in this case, and may result in resolution of this matter.

4. An ENE has been set for July 10, 2019. (ECF No. 22)

5. The parties request that all discovery be stayed up to and including the ENE date, July 10, 2019.

6. This request to stay discovery is not sought for any improper purpose or other reason of delay. Rather, it is sought only to conserve expenditures and resources of this litigation while the parties engage in settlement discussions and/or the ENE. Pursuant to LR 1-1 (b) the attorneys in this matter are seeking the stay to reduce costs.

7. Further, the goal of FRCP 1 is to "secure the just, speedy, and inexpensive" determination of all cases. Thus, staying discovery in this case is consistent with the spirit and intent of the Federal Rules of Civil Procedure.

8. The parties will submit an amended joint proposed discovery plan and scheduling order in the event that the matter is not resolved at the ENE.

Dated this 22nd day of May, 2019.

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Respectfully submitted,

Respectfully submitted,

/s/ Bruce Young

/s/ Christian Gabroy

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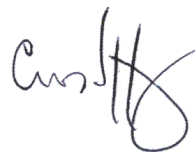
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Attorney for Plaintiff

IT IS HEREBY ORDERED

That discovery in this matter shall be stayed up to and including July 10, 2019, and the parties shall submit an amended joint proposed discovery plan should this matter not be resolved during the Early Neutral Evaluation currently scheduled for July 10, 2019.

May 23

Dated: _____, 2019.



UNITED STATES MAGISTRATE JUDGE